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**R-009-207.31**

**U.S. DOE REQUEST FOR EXTENSION ON PARTS  
1, 2, AND 3 OF THE SOUTH PLUME REMOVAL  
ACTION**

**12/06/91**

**USEPA/DOE-FO**

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**LETTER**

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

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REPLY TO ATTENTION OF:

HRE-8J

Mr. Jack R. Craig  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

RE: U.S. DOE Request for Extension  
on Parts 1, 2, and 3 of the  
South Plume Removal Action

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the United States Department of Energy's (U.S. DOE) request for a schedule extension on parts 1, 2, and 3 of the South Groundwater Contamination Plume Removal Action. Also, U.S. EPA has considered all information discussed in the November 21, 1991 meeting regarding U.S. DOE's justification for a time extension.

Pursuant to Section XVIII of the 1991 Amended Consent Agreement U.S. EPA must consider what is good cause for a schedule extension based upon information submitted by U.S. DOE.

Part 1, alternate water supply: U.S. EPA disagrees with many of the factors which U.S. DOE claims led to the schedule delay for part 1. Nevertheless, U.S. EPA considers the determination of the presence of groundwater contamination in the vicinity of State Route 128 to be a good cause for the schedule extension. The groundwater contamination in this area indicated that the groundwater plume was much larger than anticipated, which resulted in the need to redesign the alternate water supply to potentially support to other users. This resulted the need to increase the size of the wellfield, and acquire access to other property which may have led to further delays.

Part 2, pumping and discharge: Part 2 was greatly impacted by the groundwater contamination attributed from the Paddy's Run Road Superfund Site. The presence of the organic and inorganic groundwater constituents required U.S. DOE to relocate the wellfield, designed to capture the groundwater contamination from the U.S. DOE site. This relocation also caused related delays. Accordingly, U.S. EPA finds good cause for a schedule extension.

Part 3, Interim Advanced Wastewater Treatment (IAWWT) System: Part 3 was also impacted by the presence of groundwater contamination attributed from the Paddy's Run Road Superfund Site. The relocation of the interceptor wells in part 2, resulted in the need to redesign the IAWWT system to accommodate the higher uranium concentrations that would be encountered at the new location. Treatment of the uranium is required to meet the discharge limits agreed upon by U.S. DOE

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and U.S. EPA. U.S. EPA finds that U.S. DOE's need to redesign the IAWWT system to meet the treatment requirements and its related delays are good cause for a schedule extension.

Therefore, U.S. EPA has considered the revised milestones proposed by U.S. DOE and accepts the schedule extensions based upon the above good faith causes.

However, U.S. EPA recognizes that U.S. DOE has had problems gaining access to properties required to conduct the removal action. It is U.S. EPA's position that according to the 1991 Amended Consent agreement Section XXIX, U.S. DOE is expressly obligated to pursue access according to section 104(e) of the Comprehensive Environmental Response Compensation and Liability Act. U.S. DOE should also make every effort to obtain access by proceeding with easement and condemnation activities in parallel with submitting the CERCLA information to the Department of Justice.

Any further delays deemed necessary by U.S. DOE as a result of failure to obtain access will be heavily scrutinized by U.S. EPA before any schedule extensions will be granted.

If you have any questions regarding the above matter, please contact me at FTS 886-0992.

Sincerely,



James A. Saric  
Remedial Project Manager

cc: Graham Mitchell, OEPA-SWDO  
Pat Whitfield, U.S. DOE-HDQ

bcc:

David Ullrich->William Muno->Kevin Pierard, WMD  
Mary Butler, ORC  
Sandra lee, ORC  
David Kee, ARD  
Dan O'Riordan, OPA  
Ed Schuessler, PRC  
Jim Benetti, ARD